

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE	:	
COMMISSION,	:	No. 07-CV-6146
	:	
Plaintiff,	:	ECF case (PKC)
v.	:	
	:	
THEODORE ROXFORD	:	
a/k/a LAWRENCE DAVID NIREN and:	:	
HOLLINGSWORTH, ROTHWELL &	:	
ROXFORD,	:	
	:	
Defendants.	:	

NOTICE OF MOTION FOR DEFAULT JUDGMENT
AGAINST DEFENDANT HOLLINGSWORTH, ROTHWELL & ROXFORD

PLEASE TAKE NOTICE that on the accompanying Declarations of Mark H. Lineberry and Sarah L. Levine, the accompanying Memorandum of Law, and the entire record of this case, plaintiff Securities and Exchange Commission moves the Court, before the Honorable P. Kevin Castel, for entry of a default judgment against Defendant Hollingsworth, Rothwell & Roxford ("HRR") pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure.

In accordance with Local Civil Rule 55.2(b), a form of Clerk's Certificate of Default is attached to the Declaration of Sarah L. Levine as Exhibit 12, a copy of the Commission's

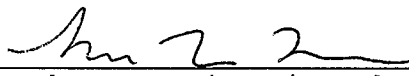
Complaint is attached as Exhibit 13, and a proposed form of default judgment is attached as Exhibit 14.

Dated: Washington, D.C.
February 6, 2008

Respectfully submitted,

Of Counsel:

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Pamela H. Nolan



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